

May 9, 1991

Ms. Christine Chulick
Remedial Project Manager
Occidental Chemical Corporation Site
SEPA Remedial Section (3HW21)
Hazardous Waste Management Division
U.S. EPA Region III
841 Chestnut Building
Philadelphia, PA 19107

Subject: Progress Report No. 6 - Activities of April 1991
Pottstown Plant Site RI/FS

Dear Christine:

This progress report is issued in accordance with the Administrative Consent Order for the RI/FS at OxyChem's Pottstown facility. The activities conducted in the month of April 1991 consisted of the following:

- i) The remaining two background samples were obtained during the week of April 8, 1991. This completes the surface sampling programs presented in the Work Plan.
- ii) Reconnaissance borehole TB-1 was drilled to a completion depth of 500 feet. Geophysical logging and a camera survey of TB-1 was completed on April 12, 1991.
- iii) Packer test intervals for TB-1 were selected and approved by EPA. Attachment A provides a summary of the packer test intervals for TB-1. The packer testing for TB-1 was completed on April 27, 1991.
- iv) The field work for the Phase II Soil Vapor Survey was conducted during the week of April 15, 1991.
- v) The validation review of samples collected from the earthen lagoons was completed.
- vi) Completeness reviews of the CLP data packages from the past winter's RI sampling events were conducted as part of the data validation reviews of those laboratory results.



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- vii) Groundwater quality screening from the packer testing program was in progress. Expedited laboratory turnaround has been assigned to samples collected from the final weeks of the packer testing program.
- viii) Analyses of subsurface data collected through the RI program was in progress through the month of April in preparation of the Interim Report and proposal for monitoring well completion.

The activities planned for the month of May 1991 consist of the following:

- i) The elevations and locations of the reconnaissance boreholes will be surveyed during the week of April 29, 1991.
- ii) Laboratory analyses of groundwater samples collected from the packer testing program will be completed during the week of May 6, 1991.
- iii) The Interim Report, including recommendations for monitoring well completion details in the reconnaissance borehole, will be submitted to EPA by May 17, 1991.
- iv) Preliminary FS activities (e.g. technology evaluation and screening) associated with the earthen lagoons will continue through May. A focus of FS efforts in May regarding the lagoons will be determination of ARARs specific to the remediation of this operable unit.
- v) The validation review of the CLP data packages from the RI sampling events will continue through May. The validation review report for the earthen lagoon analyses will be submitted with the next progress report.

Table 1 presents an estimate of the percent complete of each RI/FS scheduled activity. The adjustments proposed to the overall project schedule in last month's progress report have been modified to reflect a completion date as originally scheduled. While the RI schedule currently remains extended to reflect the inclusion of the Phase II Soil Vapor Survey into the RI/FS program, and to account for the additional time and efforts it has taken to complete the reconnaissance boring program, we have readjusted the FS schedule to its original timeframe.

OxyChem will meet with EPA after submittal of the Interim Report to discuss potential project completion strategies that will allow us to regain the lost month in the RI project schedule. We recommend that a meeting on this topic be planned for either May 28, 30 or 31, 1991. Please consider these dates and inform me of your availability.

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If you have any questions, please call me at (716) 286-3607.

Very truly yours,

Alan F. Weston/dee

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TABLE 1

PERCENT COMPLETE OF RI/FS SCHEDULE ACTIVITIES
PROGRESS REPORT NO. 5-ACTIVITIES OF MARCH 1991

RI/FS ACTIVITY	PERCENT COMPLETE	EXPECTED START	EXPECTED COMPLETION	ACTUAL COMPLETION
RI ACTIVITIES				
Progress Reports	25	Monthly	10th of Month	
Soil Vapor Survey (Original)	100	Late Nov/90		Early Dec/90
Lined Lagoon Sampling and Analyses	70	Late Feb/91	Early May/91	
Swale Sediment Sampling and Analyses	100	Early Jan/91		Early-Mar/91
Borrow Area Sampling and Analyses	100	Early Jan/91		Early-Mar/91
Background Soil Sampling and Analyses	90	Mid-Jan/91	Mid-April/91	
Stormwater Sewer Sediment Sampling and Analyses	100	Mid-Jan/91		Mid Mar/91
Sediment Pond Surface Water Sampling and Analyses	100	Early Jan/91		Mid-Mar/91
Stormwater Sewer Water Sampling and Analyses	100	Early Jan/91		Mid-Mar/91
Schuylkill River Sampling and Analyses	100	Mid-Dec/90		Mid-Mar/91
Drill/Redevelop PW-1 and PW-7	100	Mid-Dec/90		Late Jan/91
Drill 10 Test Borings	100	Mid-Dec/90		Late April/91
Geophysical Logging (not including Summer 1990 work)	100	Mid-Jan/91		Late-April/91
Camera Survey (not including Summer 1990 work)	100	Mid-Jan/91		Late-April/91
Packer Testing (not including Summer 1990 work)	90	Late Jan/91	Early May/91	
Groundwater Quality Screening	90	Late Jan/91	Early May/91	
Prepare Interim Report	50	Mid-Mar/91	Mid-May/91	
Soil Vapor Survey (Phase II)	60	Mid-April/91	Late-May/91	
Reconnaissance Borehole Well Construction and Additional Well Installation	0	Late-May/91	Late July/91	
Well Surveying	0	Late July/91	Early-Aug/91	
Groundwater Sampling (Two Rounds)	0	Mid-Aug/91	Mid-Nov/91	
Groundwater Analyses (Two Rounds)	0	Early Sept/91	Late Dec/91	
Aquifer Testing	0	Mid-Aug/91	Late Sept/91	
Data Validation	10	Late Jan/91	Late Jan/92	
Groundwater Flow Model	0	Mid-Sept/91	Mid-Nov/91	
Endangerment Assessment	5	Early June/91	Late Dec/91	
RI Analysis and Report Submission (Draft)	0	Mid-Jan/91	Late Mar/92	
RI Report Resubmission	0	Early Dec/92	Late April/92	
FS ACTIVITIES				
Preliminary ID and Screening	5	Mid-Apr/91	Mid-May/91	
Final ARAR Selection	0	Early June/91	Late June/91	
Evaluation and Conductance of Treatability Studies	0	Early Sep/91	Mid-Nov/91	
FS Chapters 1 and 2	0	Early Nov/91	Mid-Dec/91	
Engineering Studies	0	Mid-Nov/91	Late Dec/91	
Alternatives Evaluation	0	Early Jan/92	Mid-Feb/92	
Conceptual Design	0	Early Feb/92	Late March/92	
Draft FS Report Submission	0	Mid-March/92	Late May/92	

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ATTACHMENT A
TO PROGRESS REPORT NO. 6
SELECTED PACKER TESTING
INTERVALS FOR TB-1 APPROVED
BY EPA DURING THE
MONTH OF APRIL 1991

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PACKER TEST INTERVALS AND PURPOSE FOR SELECTION
BOREHOLE TB-1

Zone	Depth Interval (Feet)	Purpose of Selection
1	Above 65	Isolate upper fracture zone in which dense suspended material was encountered.
2	65 to 100	Isolate lower fracture zone and evaluate area in which change noted on temperature log.
3	102-132	Isolate zone of observed flow at 106', within zone of open horizontal and vertical fractures.
4	158-180	Assess hydrogeological characteristics and groundwater quality within fractured zone.
5	205-240	Observed flow at 219', and possibly at 207'- 209'.
6	292-322	Isolate and evaluate hydrogeological characteristics and groundwater quality within heavily fractured zones 295'-300' and 305'-320'.
7	354-376	Isolate and evaluate hydrogeological characteristics and groundwater quality within heavily fractured zone 370'-375'
8	390-420	Isolate and evaluate hydrogeological characteristics and groundwater quality within moderately fractured zones 395'-400' and 412'-418'.
9	445-500	Evaluate based zone of boring which included heavily fractured zone 450'-462'.